

EXHIBIT E

DECLARATION OF HAYLEE CHAMPAGNE

I, Haylee Champagne, declare as follows:

1. My name is Haylee Champagne. I live in Massachusetts.
2. In late September and early October 2018, I was incarcerated at the Western Massachusetts Regional Women's Correctional Center (the "WCC"). During that time period, I shared a cell with Madelyn Linsenmeir.
3. During the time I shared a cell with Madelyn, she appeared to be very ill and tired. Madelyn told me that she was in pain, including that her heart hurt, her chest felt tight, and she couldn't breathe.
4. During the time I shared a cell with Madelyn, WCC staff members would come to our cell from time to time to check on us. During these visits, I heard Madelyn tell WCC staff members multiple times that she was sick, and she stated to them that it was not from being dopesick. She told them that she had pain in her chest. I remember her saying again "my heart hurts," and "my chest feels tight," among other things. She asked multiple times to be taken to medical. WCC staff members generally responded by telling her that it was her own fault she was there and that she shouldn't do drugs, or words to that effect. During the time I shared a cell with Madelyn, I never saw anybody take her to medical.
5. This statement is a summary of my memory of these events. It does not include all the things that happened to me and Madelyn at the WCC. It does not include all of the interactions I witnessed between Madelyn and WCC staff members.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 16th, 2023.



Haylee Champagne